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Attorneys for the Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Reorganized Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF THEODORE E.
TSEKERIDES IN SUPPORT OF THE
REORGANIZED DEBTORS' REPLY IN
FURTHER SUPPORT OF THEIR ONE
HUNDRED EIGHTH OMNIBUS
OBJECTION TO CLAIMS**

[Related to Docket Nos. 11230 & 11476]

Date: February 2, 2022

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Theodore E. Tsekerides, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 1. I am a member of the law firm of Weil, Gotshal & Manges LLP, counsel to PG&E
5 Corporation and Pacific Gas and Electric Company (the “**Utility**”) (collectively, “**PG&E**” or the
6 “**Debtors**,” or, as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-
7 captioned chapter 11 cases (“**Chapter 11 Cases**”). I respectfully submit this declaration in support of
8 the *Reorganized Debtors’ Reply in Further Support of Their One Hundred Eighth Omnibus Objection*
9 *to Claims* (the “**Reply**”).¹

10 2. Attached hereto as **Exhibit A** is a true and correct copy of the *Decision Dismissing*
11 *Complaint with Prejudice*, entered by the Public Utilities Commission of the State of California in
12 *Winding Creek Solar LLC v. Pacific Gas and Electric Company*, Case 13-07-016 (May 15, 2014).

13 3. Attached hereto as **Exhibit B** is a true and correct copy of the *Opinion Adopting Tariffs*
14 *and Standard Contracts for Water, Wastewater and Other Customers to Sell Electricity Generated*
15 *from RPS-Eligible Renewable Resources to Electrical Corporations*, entered by the Public Utilities
16 Commission of the State of California, in the Order Instituting Rulemaking to Continue Implementation
17 and Administration of California Renewables Portfolio Standard Program, Rulemaking 06-05-027
18 (July 26, 2007).

19 4. Attached hereto as **Exhibit C** is a true and correct copy of the *Complaint Against Pacific*
20 *Gas and Electric Company (U 39-E) Regarding Its Failure to Enter into PPAs Under the Existing*
21 *Assembly Bill AB1969 Feed-In Tariff Program* in *Winding Creek Solar LLC v. Pacific Gas and Electric*
22 *Company*, Case 13-07-016 (July 23, 2013).

23 5. Attached hereto as **Exhibit D** is a true and correct copy of the *Motion of Pacific Gas*
24 *and Electric Company (U 39-E) for Clarification Regarding Existing Assembly Bill 1969 Feed-In-*
25 *Tariff Program*, in the Order Instituting Rulemaking to Continue Implementation and Administration
26 of California Renewables Portfolio Standard Program, Rulemaking 11-05-005 (April 5, 2013).

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¹ Capitalized terms used but not herein defined have the meanings ascribed to them in the Reply.

6. Attached hereto as **Exhibit E** is a true and correct copy of the *Motion of Allco Renewable Energy Limited for Clarification and to Direct Pacific Gas and Electric Company to Enter into PPAs Under the Existing Assembly Bill AB1969 Feed-In Tariff Program*, in the Order Instituting Rulemaking to Continue Implementation and Administration of California Renewables Portfolio Standard Program, Rulemaking 11-05-005 (July 23, 2013).

7. Attached hereto as **Exhibit F** is a true and correct copy of the Electric Sample Form No. 79-1102, Section 399.20 Power Purchase Agreement, dated November 15, 2012.

8. Attached hereto as **Exhibit G** is a true and correct copy of the *Order Correcting Typographical Error and Denying Application for Rehearing of Decision (D.) 14-05-026*, entered by the Public Utilities Commission of the State of California in *Winding Creek Solar LLC v. Pacific Gas and Electric Company*, Case 13-07-016 (November 20, 2014).

9. Attached hereto as **Exhibit H** is a true and correct copy of the Writ Denial in *Winding Creek Solar LLC v. California Public Utilities Commission*, Case A143797 (Cal. Ct. App. March 5, 2015).

10. Attached hereto as **Exhibit I** is a true and correct copy of the *Second Amended Complaint for Declaratory and Injunctive Relief* in *Winding Creek Solar LLC v. Peevey*, No. C 13-04934 JD (N.D. Cal. June 25, 2014).

11. Attached hereto as **Exhibit J** is a true and correct copy of the Electric Schedule E-SRG, Small Renewable Generator PPA, dated April 15, 2011.

Dated: December 3, 2021

New York, New York

/s/ Theodore E. Tsekerides
Theodore E. Tsekerides